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June 11, 2020

Hon. Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Goklu, 19 CR 386 (PKC)

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Dear Judge Chen;

I am writing with the consent of AUSA Fran Navarro, and with regret and apologies, in regard to the scheduled trial in the above captioned matter on August 3, 2020. Unfortunately, I will be undergoing cataract surgery on both eyes that will prevent me from both preparing and trying the case as planned. Accordingly, I respectfully request an October, 2020, date convenient to the Court.

This case was originally scheduled for trial in early June, 2020. At the time of the scheduling, I was aware of my vision issues and understood that surgery could wait until September, 2020. When the pandemic forced a reschedule, I again assumed there would be no medical issue.

I've experienced a gradual but increased vision loss for the past few months and when my ophthalmologist recently reopened her office I went for an examination. She reported a significant growth of the cataracts that explained my difficulties and recommended prompt surgery. She advised that I can no longer legally drive and while I currently struggle to read, it's likely to become prohibitive, assuming continuing deterioration, by the time the trial is supposed to commence. She recommended immediate surgery which will completely correct the problem but will take weeks of recovery before I can get a new prescription and resume driving, reading, etc.. The first surgery was scheduled today for July 1, 2020, and the second for July 23, 2020.

This is by no means a medical emergency in any sense. Unfortunately, it is a professional one as I will not be able to function as trial counsel until it is corrected.

Therefore, I respectfully request an adjournment of the trial until a date after October 1, 2020, convenient to the Court. Again, I apologize for this disruption.

Thank you for your consideration of this application.

Respectfully,

Michael H. Gold